

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: PHILIPS RECALLED CPAP, BI-  
LEVEL PAP, AND MECHANICAL  
VENTILATOR PRODUCTS LIABILITY  
LITIGATION**

Master Docket: Misc. No. 21-01230

This Document Relates To:  
*All Actions*

MDL No. 3014

**JOINT REPORT ON DISCUSSIONS RE: DISCOVERY  
AND CASE MANAGEMENT SCHEDULE**

The parties have engaged in extensive discussions in an effort to reach agreement on a discovery and case management schedule going forward, including discussions held with the assistance of Special Master Carole Katz. While the parties have been able to reach agreement on a number of the required elements to be addressed in a proposed discovery and case management order, as well as on issues that need not be addressed at this juncture of the MDL proceedings, there are some issues on which the parties fundamentally disagree which impact the case management schedule. For that reason, the parties submit their respective proposals and positions for the Court's consideration in establishing a discovery and case management scheduling order.

Plaintiffs' proposed schedule and supporting position statement are attached as Exhibits "A-1" and "A-2," respectively.

Defendants' proposed schedule and supporting position statement are attached as Exhibits "B-1" and "B-2," respectively.

Date: January 18, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's CM/ECF system on this 18th day of January 2023 and is available for download by all counsel of record.

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